

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES,

PLAINTIFF,

v.

Jimmie Anthony Beard

DEFENDANT.

Criminal Action No.

1:20-CR-351-SCJ-LTW

NOTICE OF FINANCIAL DEPOSITION OF DEFENDANT

PLEASE TAKE NOTICE that, pursuant to provisions of the plea agreement in this matter and Title 28, United States Code, Section 3015(b), and Federal Rules of Civil Procedure 26 and 30, the undersigned counsel, on behalf of United States of America, will take the deposition of **Jimmie Anthony Beard** on **Tuesday, August 20, 2024 at 10:00 A.M. EST via videoconference**. The office of the court reporter or counsel for the government will send a link to all necessary parties to log into the deposition.

The deposition will be taken and the witness sworn via remote audio/visual means the oath will be administered and the deposition will be transcribed, remotely by a certified court reporter, or other person authorized to administer oaths, via audio-visual technology. All participants must join the deposition using an electronic device with internet, video, microphone and keyboard functionality compatible with Zoom, Webex or other software as may

be agreed by the parties. The witness is directed to produce for inspection and copying the documents listed in Attachment A, which are items the government previously requested from defense counsel.

The deposition will continue from day-to-day until adjourned. It will be taken for the purpose of discovery and any other purpose permitted by the applicable rules of procedure.

Dated: August 12, 2024.

RYAN A. BUCHANAN
UNITED STATES ATTORNEY

/s/ Jeffrey A. Brown

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Certificate of Service

I hereby certify that the foregoing document was filed and served using the Court's CM/ECF system, which sent a notice and link to the document to all parties of record.

/s/ Jeffrey A. Brown

Jeffrey A. Brown
Assistant United States Attorney

ATTACHMENT "A"

DEFINITIONS

1. **"Defendant"** means the defendant or witness to which this attachment, and any subpoena, or discovery request, is directed.

2. **"Account"** shall mean any account (including any deposit, checking, savings, investment, brokerage, time-deposit, retirement, IRA, 401(k), or qualified tax-deferred account), held by a bank or financial institution.

REQUESTS

1. For the last two (2) years, all monthly statements for any Account on which Defendant is an owner (whether solely or jointly), signatory, or beneficiary, including statements for the following accounts: TD Bank accounts xxxx3690 and xxxx7042, Wells Fargo Bank account xxxx2798, JP Morgan Chase Bank accounts xxxx9073, xxxx6991, xxxx3989, JP Morgan Chase Bank credit card account xxxx1083, Bank of America Bank accounts xxxx7604, xxxx1783, and Bank of America credit card cccount xxxx1286, American Express credit card account xxxx1005, Citi Bank credit card account xxxx0098, Juniper credit card services account xxxx0498, Omega Boutique credit card account xxxx5859, and bank accounts associated with Consulting Group LLC and Concentric Municipal Advisors LLC. (Please do not provide copies of any statements previously provided to the government).

2. For the last three (3) years in which Defendant was employed (part-time or full-time), all wage, income, 1099 forms, or earning statements, including paychecks.

3. For the last three (3) years, all of the Defendant's filed federal *and* state income tax returns (regardless of filing status), with all attachments and schedules, including all Forms W-2, 1099, and K-1.

4. For the last three (3) years, and for any corporate entity in which you are owner, shareholder, or member, all filed federal *and* state income tax returns, with all attachments and schedules, including all Forms W-2, 940, 941, 1099, and K-1.